

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**NATASHA POWELL BROWN**

**PLAINTIFF**

**V.**

**NO. 3:14-cv-00869-CWR-FKB**

**DEUTSCHE BANK NATIONAL TRUST COMPANY, AS  
TRUSTEE FOR ARGENT SECURITIES, INC. ASSET-BACKED  
PASS-THROUGH CERTIFICATES, Series 2003-W8;  
HOMEWARD RESIDENTIAL, INC., F/K/A AMERICAN HOME  
MORTGAGE SERVICING, INC.; CITI RESIDENTIAL LENDING, INC.;  
ADAMS & EDENS; L&M, LLC; and JOHN & JANE DOES, 1-100**

**DEFENDANTS**

**PLAINTIFF'S MOTION TO REMAND**

Plaintiff, through undersigned counsel, moves this Honorable Court for an Order remanding this case to the Circuit Court of Hinds County, Mississippi, for the following reasons:

**I.**

This case was originally and properly filed in the Circuit Court of Hinds County, Mississippi.

**II.**

This case was initially removed to this Court on November 7, 2014, for and on behalf of Defendant, Deutsche Bank National Trust Company, as Trustee for Argent Securities, Inc. Asset-Backed Pass-Through Certificates, Series 2003-W8. The removal was joined in by Homeward Residential, Inc. f/k/a American Home Mortgage Servicing, Inc., Citi Residential Lending, Inc., and Adams & Edens on November 7, 2014, and L&M, Inc., on November 26, 2014.

III.

For reasons set forth in Plaintiff's Memorandum in Support of Motion to Remand, this Court does not have subject matter jurisdiction, and therefore, this case should be remanded to the Circuit Court of the First Judicial District of Hinds County, Mississippi.

WHEREFORE, Plaintiff prays that this case be remanded to the Circuit Court of the First Judicial District of Hinds County, Mississippi.

Further, Plaintiff requests attorneys' fees and costs in addressing Defendants' meritless removal.

Respectfully submitted, this 8<sup>th</sup> day of December, 2014.

NATASHA POWELL BROWN

BY: s/W. Joseph Kerley  
W. JOSEPH KERLEY

**CERTIFICATE OF SERVICE**

I, W. JOSEPH KERLEY, do certify that on December 8, 2014, I electronically filed the above and foregoing *Plaintiff's Motion to Remand* with the Clerk of the Court using the ECF system, which sent notification of such filing to the following:

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